

UNITED STATES BANKRUPTCY COURT DISTRICT OF
NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-1(b)

HLADIK, ONORATO & FEDERMAN, LLP

Danielle Boyle-Ebersole, Esquire

Attorney for Movant

298 Wissahickon Avenue

North Wales, PA 19454

215-855-9521

Attorney for CSMC 2022-RPL4 Trust

In Re:

Tracey Campbell aka Tracey Harvell

Debtor

Case No: 24-19320-JNP

Hearing Date: 11/20/2024 at 9:00AM

Chapter: 13

Judge: Jerrold N. Poslusny, Jr.

OBJECTION TO CONFIRMATION OF THE PLAN

Movant, CSMC 2022-RPL4 Trust (“Movant”), by its attorneys, Hladik, Onorato & Federman, LLP, objects to confirmation of the Chapter 13 Plan of Debtor, Tracey Campbell aka Tracey Harvell (“Debtor”), as follows:

1. As of the bankruptcy filing date of September 20, 2024, Movant holds a secured claim against the Debtor’s property, located at: 306 Ivy Court, Marlton, NJ 08053 (the “Property”).
2. Movant is in the process of filing a Proof of Claim by the 12/02/2024 bar date, with an estimated secured claim in the amount of \$116,757.12, and estimated pre-petition arrears in the amount of \$10,100.20.
3. The Plan currently proposes to pay Movant in the amount of \$8,000.00 for pre-petition arrears.
4. The Plan fails to cure the delinquency pursuant to 11 U.S.C. § 1322(b)(5).
5. The Plan violates of 11 U.S.C. § 1325(a)(5)(B)(ii) by not providing for Movant to receive the full value of its claim.

6. Movant objects to the feasibility of the Plan under 11 U.S.C. § 1325(a)(6). The Plan proposed by Debtors is not feasible. Movant requests that the bankruptcy case either be converted to a Chapter 7 or be dismissed pursuant to 11 U.S.C. § 1307.

WHEREFORE, Movant respectfully requests that this Honorable Court deny confirmation of the Debtors' Chapter 13 Plan.

Respectfully submitted,

Dated: 10/16/2024

/s/ Danielle Boyle-Ebersole, Esquire
Danielle Boyle-Ebersole, Esquire
Attorney I.D. # 022792000
Hladik, Onorato & Federman, LLP
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North Wales, PA 19454
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CERTIFICATION OF SERVICE

1. I, Ashley Stranix:

☐ represent the _____ in the above-captioned matter.

☒ am the secretary/paralegal for Hladik, Onorato & Federman, LLP, who represents CSMC 2022-RPL4 Trust in the above captioned matter.

☐ am the _____ in the above case and am representing myself.

2. On October 17, 2024 I sent a copy of the following pleadings and/or documents to the parties listed below:

Objection to Confirmation of the Plan

3. I hereby certify under penalty of perjury that the above documents were sent using the mode of service indicated.

Dated: October 17, 2024

/s/ Ashley Stranix
Ashley Stranix

Name and Address of Party Served	Relationship of Party to the Case	Mode of Service
Tracey Campbell aka Tracey Harvell 306 Ivy Court Marlton, NJ 08053	PRO SE Debtor	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-mail <input type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other _____ (as authorized by the court *)
Andrew B. Finberg, Esquire 535 Route 38, Suite 580 Cherry Hill, NJ 08002	Trustee	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular Mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-mail <input checked="" type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other _____ (as authorized by the court *)

* May account for service by fax or other means as authorized by the court through the issuance of an Order Shortening Time.